

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Hassan Yehia Chokr

Case: 2:22-mj-30527

Case No. Assigned To : Unassigned Assign

Date : 12/15/2022

USA V. CHOKR (CMP)(CMC)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 2, 2022 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

18 U.S.C § 922(a)(6)

Offense Description

Providing a False Statement during the Attempted Acquisition of a Firearm

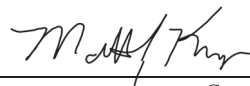
This criminal complaint is based on these facts:

☐ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: December 15, 2022

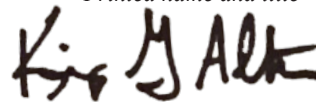
City and state: Detroit, MI



Complainant's signature

Matthew Krupa, Special Agent

Printed name and title



Judge's signature

Hon. Kimberly G. Altman

Printed name and title

AFFIDAVIT IN SUPPORT OF AN APPLICATION
FOR A CRIMINAL COMPLAINT

Your Affiant, Matthew J. Krupa, being duly sworn, does depose and state:

Affiant Background and Purpose of Affidavit

1. Your Affiant is a Special Agent (SA) with the Federal Bureau of Investigation (FBI), Detroit Division, and has served in that capacity since 2004. Prior to that, I was a police officer in the City of Pontiac, State of Michigan, for over ten years. As a Special Agent, I have investigated violent crime, gang, narcotics, and criminal enterprise cases, many of which involved Federal firearms violations. I am currently assigned to the Oakland County Resident Agency of the FBI. As a federal agent, your Affiant is a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws.

2. The information set forth in this Affidavit is based upon my participation in this investigation, review of law enforcement reports, discussions with other law enforcement officers involved in the investigation, and my experience and training. This Affidavit does not set forth every fact your Affiant has learned during this investigation, but rather is provided solely for establishing probable cause in support of the application for a Complaint in this matter.

3. This Affidavit is submitted in support of a Criminal Complaint charging Hassan Yehia CHOKR (DOB XX/XX/1987) with Providing a False Statement

during the Attempted Acquisition of a Firearm in Violation of Title 18, United States Code, Section 922(a)(6). The information contained in the following paragraphs is either personally known to me or was told to me by other law enforcement officers.

Facts Supporting Probable Cause

4. Based on interviews I conducted, and records and surveillance videos I obtained and reviewed during the course of this investigation, on December 2, 2022, Hassan CHOKR entered Dearborn Outdoors, a Federal Firearms Licensee located at 15101 Century Dr., Suite 504, Dearborn, Michigan 48120, and proceeded to look at and inquire about several firearms. Around 12:00 p.m., while inside the store, CHOKR completed an electronic ATF Form 4473, Firearms Transaction Record, and signed the form electronically. As part of the attempted firearm acquisition process, a photocopy was made of CHOKR'S Michigan Driver's License by employees of Dearborn Outdoor, identifying the attempted purchaser as Hassan Yehia CHOKR, DOB XX/XX/1987.

5. In completing the electronic ATF Form 4473, CHOKR checked the "No" box located in Section B, Question 21b, indicating that he is not under indictment or information in any court for a felony, or any other crime for which the judge could imprison him for more than one year. CHOKR also checked the "NO" box located in Section B, Question 21c, indicating that he has never been convicted in any court,

including a military court, of a felony, or any other crime for which the judge could have imprisoned him for more than one year.

6. CHOKR then electronically signed and dated Questions 22 and 23, certifying as set forth in the ATF Form 4473 that the answers in Section B are true, correct, and complete, and that he understands that a person answering “Yes” to any of the questions in block 21, including questions 21b and 21c, is prohibited from receiving or possessing a firearm.

7. I reviewed the ATF Form 4473, obtained from Dearborn Outdoor, dated December 2, 2022. As noted above, the ATF 4473 was completed and signed electronically by Hassan CHOKR on December 2, 2022, for the attempted acquisition of a Landor Arms, model BPX902, 12-gauge shotgun, serial number BPX09084; a Del-ton, model DTI-15, 5.56mm rifle, serial number DTI-A000461; and a Glock, model 19 gen4, 9mm semi-automatic pistol, serial number BBEN714. The purchase was denied by the National Instant Criminal Background Check System (NICS) and the firearms were not transferred to CHOKR.

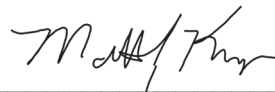
8. On December 14, 2022, a review of the Register of Actions for the 3rd Judicial Circuit Court of Michigan revealed that on August 27, 2020, CHOKR was charged in an Information with Assault with a Dangerous Weapon (Felony Assault), in violation of MCL 750.82, and has a jury trial scheduled for February 21,

2023. MCL 750.82 is a felony offense that carries a maximum penalty of imprisonment of 4 years.

9. On December 6, 2022, a criminal history check of CHOKR revealed that CHOKR had been previously convicted in 2017, of Felony Financial Transaction Device – Stealing/Retaining Without Consent in the 44th Circuit Court, Livingston County, MI.

Conclusion and Request

10. I submit that based on the facts set forth in this Affidavit, probable cause exists that on December 2, 2022, in the Eastern District of Michigan, Hassan CHOKR, did knowingly provide a false statement during the attempted acquisition of a firearm in violation of Title 18, United States Code, Section 922(a)(6). Accordingly, I respectfully request this Court issue a Criminal Complaint charging CHOKR with this crime, along with a warrant for his arrest.



Matthew J. Krupa, Special Agent
Federal Bureau of Investigation (FBI)

Sworn to before me and signed in my
presence and/or by reliable electronic means.



Honorable Kimberly G. Altman
UNITED STATES MAGISTRATE JUDGE

Dated: December 15, 2022